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numerical weight of authority is still *contra* to this holding. The courts which deny recovery under a similar statement of facts do not however, require that bodily injury must consist of a bruise, wound, or physical pain but mere impact seems to be sufficient, even if such impact is indirect. On this point see *Traction Co. v. Lambertson*, 59 N. J. L. 297, 36 Atl. 100; *Buchanan v. West Jersey R. R. Co.*, 52 N. J. L. 265, 19 Atl. 254; *Warren v. Boston R. R. Co.*, 163 Mass. 484; *Driscoll v. Gaffey*, 207 Mass. 102, 92 N. E. 1010; *Hess v. Mfg. Co.*, 221 Pa. St. 67, 70 Atl. 294. For a discussion on the question involved in the principal case see 8 MICH. L. REV. 44; 5 COL. L. REV. 179; 12 A. & E. ANN. CASES, 741.

DEEDS—RESTRAINTS ON ALIENATION,—VALIDITY.—B, a married woman, received land under a grant, for her sole and separate estate, with right of disposal by will, "but without power to mortgage or otherwise incumber, or to sell or convey the same during her life." A statute of Kentucky, in existence when the conveyance was made, gave married women the right to convey or devise their separate estates unless forbidden by the instrument under which such estates were acquired. B contracted to sell the land to defendant C who then refused to perform because B could not give a good title. *Held*, that B had a fee and could sell during her life, and that C must perform, for the restraint on her right to alienate the land given her was void as unreasonable. *Cropper v. Bowles* (Ky. 1912) 150 S. W. 380.

As a general proposition, when an estate is given to one in fee, restrictions against alienation are void as against public policy. 13 Cyc. 687; 2 TIFFANY, REAL PROPERTY, 1135; *Murray v. Green*, 64 Cal. 363; *Munroe v. Hall*, 97 N. C. 206; *Miller v. Denny*, 99 Ky. 53; *Booker v. Booker*, 104 N. Y. S. 21; *Diamond v. Rotan*, 124 S. W. 196; *Pritchard v. Baily*, 113 N. C. 521; *Teany v. Mains*, 113 Ia. 53; *Latimer v. Waddell*, 119 N. C. 370. There is an exception to this general rule, that there may be a restriction placed on the alienation of property granted, if it be reasonable. 13 Cyc. 687; *Munroe v. Hall*, 97 N. C. 206. For example, a condition that the grantee shall not alienate for a particular time, or to a particular person, is good. *Langdon v. Ingram's Guardian*, 28 Ind. 360. Or a restriction is good if for the life of any person in existence at the time of the grant. *M'Williams v. Nisly*, 2 Serg. & R. 507. Also a condition, where husband and wife were grantees in equal parts, that the wife should not sell or incumber her half, was held good in *Hicks v. Cochran*, 4 Edw. Ch. 107. Finally, a restraint on alienation may be imposed in granting the separate estate of a married woman, especially where the estate is an equitable one. 13 Cyc. 687; 2 PERRY, TRUSTS, §§ 670-1; 2 TIFFANY, REAL PROPERTY, 1138; *Camp v. Cleary*, 76 Va. 143. Under the Kentucky statute cited in the principal case it is impossible to see how the restraint can be judged unreasonable, for to hold it reasonable would be merely to carry out the exact wording of the statute, for the provision against alienation by Mrs. B during her life was contained in the grant to her. The cases cited by the court, *Stewart v. Brady*, 3 Bush. 623, and *Harkness v. Lisle*, 132 Ky. 767, while they discuss the general rule against alienation, do not touch on the exception of married women's estates.